

EXHIBIT 17

In the Matter Of:

Google 60-516110-0009

SCOTT SPENCER

August 12, 2021



1 Q. But beyond that, no other electronic
2 devices?

3 A. I think my tablet does. I think I have an
4 iPad that has e-mail access to it. But it's all
5 e-mail.

6 Q. What software do you use in connection with
7 your work at Google?

8 A. Google Docs, Google G Suite e-mail.

9 Q. Let's take those one by one. So do you use
10 the G Suite for your work at Google?

11 A. I think the G Suite is now the name for
12 Gmail, Google Docs, Presentation, those things, so
13 yes.

14 Q. Does G Suite contain Google Hangouts?

15 A. I think it does.

16 Q. Do you know what Google Hangouts is?

17 A. Google Hangouts is for -- it's like -- it's
18 now Google Meet, that's Google Hangouts. I forget
19 which one became what name.

20 Q. What is Google Meets or Google Hangouts,
21 depending on the name?

22 A. A videoconferencing software.

23 Q. Does that include a chat functionality?

24 A. There's a chat on the side of the video.

25 Q. Does G Suite include any other chat

1 programs?

2 A. It has Google Chat.

3 Q. Any other chat programs besides Google
4 Chat?

5 A. I think those are the current ones. I'm
6 not an expert on what they name things.

7 Q. Do you know what an on-the-record chat is?

8 A. Yes.

9 Q. And what is an on-the-record chat?

10 A. It's if it saves the chat.

11 Q. Have you ever marked a chat as on the
12 record?

13 A. I don't think I've changed the default. I
14 use it for figuring out meetings.

15 Q. So there is a default setting for
16 on-the-record chats?

17 A. I'd have to check. I think so. Again, I'm
18 not an expert on it.

19 Q. Is the default setting to have chats on the
20 record or off the record?

21 A. I think the default is that it's off the
22 record. Or history is off.

23 Q. Okay. And have you ever changed that
24 setting so that history is on?

25 A. I don't think so.

DEPOSITION OFFICER'S CERTIFICATE

COUNTY OF LOS ANGELES,)

STATE OF CALIFORNIA,)

I, Cody R. Knacke, hereby certify:

I am a duly-qualified Registered Professional Reporter and Certified Shorthand Reporter in and for the State of California, holder of Certificate Number CSR 13691, issued by the Court Reporters Board of California and which is in full force and effect. (Fed. R. Civ. P. 28(a)).

I am authorized to administer oaths or affirmations pursuant to California Code of Civil Procedure, Section 2093(b) and prior to being examined, the witness was first duly sworn by me. (Fed. R. Civ. P. 28(a), 30(f)(1)).

I am not a relative or employee or attorney or counsel of any of the parties, nor am I a relative or employee of such attorney or counsel, nor am I financially interested in this action. (Fed. R. Civ. P. 28).

I am the deposition officer that stenographically recorded the testimony in the foregoing deposition and the foregoing transcript is

1 a true record of the testimony given by the witness.
2 (Fed. R. Civ. P. 30(f)(1)).

3 If requested, any changes made by the
4 deponent (and provided to the reporter) during the
5 period allowed, are appended hereto. (Fed. R. Civ.
6 P. 30(e)).

7 In witness whereof, I have hereunto set my
8 hand this day: _____, 2021.

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14



15 CODY R. KNACKE, RPR, CSR No. 13691